In sum, an MSO that owned a network or a network that owned an MSO would have the means and motive either to discriminate against local and distant stations competing against its affiliates, or to discriminate in favor of its own cable programming services and against the network programming on which its affiliates base their survival. Either type of conglomerate would also enjoy unparalleled leverage in its negotiations both with its affiliates and independent program suppliers. In short, repeal of the network/cable cross ownership rule could enhance considerably cable's market power while at the same time helping to destroy the competitive viability of the network/affiliate system in particular and the television broadcasting system in general.

B. Potential Adverse Consequences That Could Result From the Elimination of the Prohibition Against Cable/Broadcast Cross Ownership

Many of the evils and potentially adverse consequences that could flow from elimination of the cable/network cross ownership rules apply with equal or greater force, were a local cable operator or group of operators also allowed to own a full power television station in its service area. An entity that owned the video gateway for all television stations in a market to a majority, and in some instances to almost all, of the homes in their service area, and that owned one of those stations as well, would have almost unfettered discretion to discriminate in favor of both its station and its cable programming services by manipulating carriage and channel positioning, heavily promoting its broadcast station on a multiplicity of cable channels, and offering combination advertising rates. Such activities could easily emasculate any strong broadcast competitors in its market, drive weaker broadcast competitors out of the market entirely, and completely frustrate new entrants. The result would be the inhibition of competition among local distributors of television programming and competition in the sale of local television advertising to the detriment of subscribers, non-subscribers and advertisers.

As demonstrated earlier in the discussion of national ownership limits on broadcast stations, the Commission's primary focus and concern in assuring viewpoint diversity and avoiding undue economic concentration is correctly directed at local markets. Elimination of either the network cable or broadcast cable cross ownership prohibitions would have profound adverse consequences for both viewpoint diversity and economic concentration in the local video marketplace. In this regard, it is passing strange that the Commission would even consider recommending elimination of these rules at the same time when Congress actively is considering imposing cross ownership restrictions that would generally prohibit a local cable operator from owning an MMDS or SMATV system in its franchise area and would impose limits on cable ownership of DBS.[87/]

VI. THE RESTRICTIONS ON TELCO ENTRY INTO THE PROVISION OF THE VIDEO SERVICES ALSO SHOULD BE RETAINED

> Those who cannot remember the past are condemned to repeat it.[88/]

87/ S. Rep. No. 102-92, 102nd Cong. 1st Sess. 46-47 (1991).

88/ Santayana, George, The Life of Reason, Vol. I.

> History is a nightmare from which we are trying to awaken.[89/]

Perhaps one of the greatest mistakes in recent telecommunications history was allowing the creation of a monolith that both controlled the distribution pipeline of video services to the home and retained a substantial interest in the services delivered through that pipeline. While the video marketplace is still attempting to awaken from this historical nightmare, permitting entry of the telco monolith with its even greater potential to dominate both the content and distribution mechanism for video services to the home would create a nightmare from which it might never recover.

Briefly summarized, NAB's position on telco entry is that: 1) Telcos should come into the video marketplace only in an "overbuild" situation where they provide actual competition to existing cable systems. No competition is created when a telco purchases an existing cable system; 2) Telcos should provide video services only as common carriers; and 3) Telcos should have no editorial discretion (control of content) over the video services they provide.

Once fiber optics are in place, telcos will have the single wire with the most advanced technology to the home. If telcos are also allowed to control even some of the content of what they deliver on their conduit, with the enormous financial resources at their disposal,[90/] there would be nothing to stop them from

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89/ James Joyce.

90/ In 1989 the revenues of the seven RBOC's alone were more than double that of the entire broadcasting industry and the asset value of the regulated local exchange (continued...)

crushing their competitor and becoming the sole source of all information services, including video, to the home.

Some have suggested that telco entry into cable would provide the panacea to curb existing cable abuses through competition. In NAB's view, however, unrestricted telco entry will not fulfill the promise of competition, but will, instead, subject consumers and video competitors to more of the same problems they face now.

Unfortunately, it is probably too late to rewrite the rules for the cable industry that would correct the mistakes necessary to restore a complete balance to the video marketplace. But the history of those mistakes should be remembered, least we not be condemned to repeat them.

VII. THE ARCHAIC DUAL NETWORK RULE SHOULD BE REPEALED

The dual network rule prohibits television stations from affiliating with a network organization that maintains more than one network of television stations unless the networks are not operated simultaneously or unless there is no substantial overlap in the territory served by the networks.[91] Its origins date back to the 1941 Report on Chain Broadcasting,[92] which was intended generally to remedy the then

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90/ (...continued)
telephone industry was more than 3 times larger than that of the broadcasting industry. Coen, Bob McCann-Erickson; Paul Kagan Associates; Phone Facts, 1990, USTA (Unpublished); Communications Daily, July 19, 1990 at 3.

91/ Section 73.658(g) of the Commission's rules.

92/ Dkt. No. 5060 (May 1941).

dominance of NBC and CBS in radio, and specifically to deal with NBC's potential to monopolize non-local program services in many communities resulting from its operation of both the Red and Blue radio networks.[93] The rule was extended to cover television in 1946.[94] The purpose of the rule is to provide program diversity by ensuring that a single organization does not dominate the broadcast services in an area by the operation of two networks, and of ensuring economic competition in the advertising market.[95]

In 1977, the Commission repealed its dual network rules for radio, citing inter alia: 1) the "tremendous increase" in the number of stations generally and in particular markets; 2) the increase in the number of program services; and 3) the reduced economic importance of networks in the radio marketplace both in terms of their revenues and profitability.[96]

Clearly the same radically changed circumstances that prompted the Commission's repeal of the dual network rule for radio now apply to television as well. From 1975 to 1990 alone, the number of broadcast stations increased by over 50% with independent stations accounting for three quarters of that growth.[97] During that period the number of off-air stations available to the median household

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93/ Home Shopping Network, 66 R.R.2d 175, 176 (1989).

94/ Amendment of Part 3 of the Commission's Rules, 11 FR 33 (Jan. 1, 1946).

95/ Home Shopping Network, supra, 66 R.R.2d at 177.

96/ Report, Statement of Policy, and Order in Dkt. No. 20721, 40 R.R.2d 80, 84 (1977).

97/ OPP Report at vii.

increased from 6 to 10 and, by 1990, ninety-four percent of television households were located in markets with five or more television stations.[98/]

In 1990, program services available to cable included 73 nationwide basic networks, 14 regional networks, 24 regional sports networks, 9 pay channels, 8 home shopping networks and 8 pay per view channels, not to mention the availability of distant broadcast channels.[99/] Moreover, in 1990, 89.3% of cable subscribers had access to 30 or more channels, with only 1.3 percent having access to 12 or fewer channels.[100/]

While the economic importance of the broadcast networks in the video marketplace is still significant, it is not nearly what it was even 15 years ago,[101/] and the decline in network profits is a matter of public record. Moreover, there is no economic or policy justification for continuing to allow TCI, Time-Warner or any other major MSO to own a limitless number of simultaneously operated national and regional cable programming services, while at the same time denying a television broadcast network the opportunity of simultaneously operating even two broadcast programming services.[102/]

98/ Id.

99/ Id. at 76.

100/ Id. at 84-85. An additional 3% of television households also had access to a wide array of programming choices via home satellite dishes. Id. at viii.

101/ OPP Report at viii-x.

102/ Indeed, it also seems anomalous to allow a television broadcast network to simultaneously operate a limitless number of cable program networks but not allow them to operate even two broadcast networks.

Under these circumstances, the potential abuses and practices which the 1946 dual network rules were designed to address clearly are no longer existent. Further, the incentive created for investment in cable services by the absence of any restriction on multiple cable network operation runs counter to the goal of encouraging diverse broadcast services. While these factors alone would be sufficient justification to repeal the rule, yet another reason is to provide the necessary regulatory flexibility to encourage the promotion of future technologies such as signal compression. Simply stated, if broadcasters or others devote the resources necessary to develop signal compression techniques for terrestrial broadcasting such that a local broadcaster is able to provide multiple broadcast signals within its assigned frequency, from what source is the additional programming going to come to occupy those additional signals?

Elimination of the dual network rule now would stimulate both broadcast networks and stations to develop signal compression technology. For the broadcast networks, elimination of the rule could spur investment in signal compression technology with the idea of developing additional national programming services which experienced, well established local stations would have the added capacity to accommodate. For local affiliates, elimination of the rule could provide an incentive to invest in such technology by creating the flexibility to allow their networks to provide programming needed to occupy the additional channels resulting from compression. Thus, for example, a network buying the rights to the Olympics would have the option of providing to its affiliates the opportunity to carry both popular events, on one channel, and events appealing to more specialized interests on another channel, instead of having to siphon the latter package of events off to pay-per-view cable.

Finally, unlike repeal of the network/cable rules, which has the potential of driving an enormous wedge between networks and their affiliates and dividing the loyalty of an existing broadcast network between its cable and broadcast interests, repeal of the dual network rule would provide both networks and their affiliates with growth and additional revenue source opportunities within the framework of the existing free over-the-air broadcast system.

VIII. REGULATIONS PERTAINING TO SIGNAL COMPRESSION MUST ACCOMMODATE AND PROMOTE THE EXISTING TELEVISION BROADCAST SYSTEM

Over the past two years, the prospect of an early arrival of a viable system of signal compression has become a near reality, promising the ability to transmit multiple video signals in the bandwidth now occupied by one signal. Cable and DBS systems which adopt such new technologies would be able to multiply their channel capacity at relatively low cost, raising the possibility of hundreds of channels being supplied to a home, even without replacing existing delivery systems with fiber optics.

The full impact of a change from an average cable system being able to deliver 40-50 channels to a capability of 160-200 channels is impossible to measure. Certainly, audiences will be further divided, raising new questions about the economic basis for the creation of new programming.[103] In that environment, traditional broadcasters may stand out more if they are able to continue to provide a steady stream of original programming. On the other hand, the increased options for cable viewing, both of "niche" channels and programming of general appeal repeated throughout the day, may hasten a decline in broadcast station audiences.

Signal compression technology, however, presages another possibility for television broadcasters — that of becoming multichannel video providers themselves. Various signal compression techniques may be readily adaptable to providing multiple program channels over the bandwidth which broadcasters now require for each channel. With that development, broadcasters could have some of the advantages now reserved for cable operators, such as the ability to offer different program packages to advertisers, and to attract larger total audiences by appealing to several more limited interests simultaneously. If broadcasters in an area can offer over the air a range of programming similar to cable operators, broadcasters could then offer true competition to cable to the ultimate benefit of consumers.

It is too early for the Commission to establish regulatory policies for over-the-air signal compression. In determining the rules for television, and in considering any standards for signal compression, however, the Commission should retain awareness of the need to integrate any signal compression technology into the extant television broadcast system.

103/ This prospect was discussed in the OPP Report at 146-47.

In particular, as signal compression technology becomes a practical reality, broadcasters must be able to use the capability of offering multiple program services themselves, rather than having to face challenges from other potential suppliers, a development which would only weaken over-the-air broadcasting through further division of local markets. The Commission should also ensure that any technical standards it adopts for signal compression are compatible with distribution of over-the-air television signals. As the Commission considers technical changes to television signals and means of transition between existing and new standards, it should consider at each stage how its proposals can be integrated into a plan to permit existing broadcasters to take advantage of signal compression technology.

IX. CONCLUSION

The change to a multichannel programming environment brought about by the growth of cable systems and cable networks threatens the future viability of over-the-air television stations and broadcast networks. This threat is not only the result of new technologies, but is the byproduct of various piecemeal regulatory actions and inactions that have enhanced the development of broadcast competitors, while continuing unnecessarily to shackle the over-the-air broadcasting system. Accordingly, the Commission's comprehensive inquiry and review of the entire regulatory structure of the video marketplace at this time is most appropriate.

To restore a balance to the video marketplace, and to assure the continued viability of the free over-the-air television system in that marketplace, requires not the indiscriminate elimination of all broadcast/cable regulation, but rather as proposed herein, the selective removal of certain outmoded restraints, the retention of those that remain viable and, most importantly, the augmentation of the broadcast/cable relationship through the adoption of must carry and retransmission consent.

Respectfully submitted,

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APPENDIX A

NATIONAL OWNERSHIP CONCENTRATION OF TELEVISION STATIONS

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November 21, 1991

Although television stations compete with each other only in local markets, there has been concern raised as to national ownership concentration. That concern has been voiced on the issue of diversity as well as economic concentration. This study looks at the degree of national concentration in two ways, calculating a commonly used index of concentration and listing the different owners of the top rated stations in the top 25 television markets. Both approaches lead to the inescapably strong conclusion that television station ownership is not concentrated.

In order to determine whether markets are concentrated, economists and antitrust lawyers use market share calculations. For many years, an industry was characterized as concentrated depending upon the combined share of the top four or eight firms. In more recent years an alternative measure, the Herfindahl-Hirschman index (HHI), has been used. This measure sums the squares of the shares of the firms within a particular industry and that result is compared with general guidelines. This index is used by the Department of Justice in evaluating potential mergers.[1] According to DOJ, markets with an HHI below 1,000 are unconcentrated; markets whose HHI is greater than 1,000 but less than 1,800 are judged moderately concentrated; markets whose HHI exceeds 1,800 are highly concentrated.

By using this measure we have found that the television industry, viewed on a national basis, is highly **unconcentrated**. The HHI for the entire television industry, using stations' delivery of households, is 187 which is way below the DOJ cut-off for even moderately concentrated industries. The attached pages list the groups with their corresponding number

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1 Department of Justice, *Merger Guidelines*, June 1984.

of average television households delivered for the May 1990 Arbitron sweeps period.[2] The ratings used were for the entire sign-on to sign-off time period for each of the stations. Shares were calculated for each of the groups based on the average total number of U.S. households delivered of 24,176,158 during that time period in May 1990.

Since television stations compete in local markets, another way of evaluating whether there is national concentration is to see which companies own those local market leaders. We examined the top rated station in the top 25 markets to see whether a handful of companies own the market leaders. Of the 27 stations who lead in the top 25 markets (two markets have ties), 17 groups are represented. Once again we are using the May 1990 Arbitron data for the sign-on to sign-off daypart ratings. The following table lists the leading station by market with their share and their owner.

Top Rated Station in Top 25 Markets

ADI	Market	Station	Share	Owner
1	New York	WABC	21	Capital Cities/ABC
2	Los Angeles	KABC	14	Capital Cities/ABC
3	Chicago	WLS	23	Capital Cities/ABC
4	Philadelphia	WPVI	24	Capital Cities/ABC
5	San Francisco	KGO	17	Capital Cities/ABC
6	Boston	WCVB	20	Hearst Corp.
7	Dallas-Ft. Worth	WFAA	23	Belo Broadcasting
8	Detroit	WXYZ	23	Scripps-Howard Broadcasting
9	Washington, D.C.	WUSA	19	Gannett
10	Houston	KTRK	23	Capital Cities/ABC
11	Cleveland	WEWS	20	Scripps-Howard Broadcasting
		WJW	20	Gillett Communications
12	Atlanta	WAGA	21	Gillett Communications
13	Tampa-St. Petersburg	WTVT	23	WTVT, Inc.
14	Minneapolis-St. Paul	WCCO	28	Midwest Comm. (sold to CBS)
15	Miami-Ft. Lauderdale	WPLG	18	Post-Newsweek Stations
16	Seattle-Tacoma	KOMO	19	Fisher Broadcasting
		KING	19	King Broadcasting
17	Pittsburgh	KDKA	28	Westinghouse Broadcasting
18	St. Louis	KSDK	28	Multimedia Broadcasting
19	Denver	KUSA	20	Gannett
20	Phoenix	KTSP	23	Great American Broadcasting
21	Sacramento-Stockton	KCRA	21	Kelly Broadcasting
22	Baltimore	WBAL	23	Hearst Broadcasting
23	Hartford-New Haven	WFSB	23	Post-Newsweek Stations
24	Orlando-Daytona Beach	WFTV	26	Cox Communications
25	San Diego	KGTV	21	McGraw-Hill Broadcasting

[2] There are some groups listed with zero households delivered. That is because none of their stations reached the minimum reporting standards for that time period.

DELIVERY OF U.S. TELEVISION HOUSEHOLDS BY GROUP - MAY 1990 ARBITRON SWEEPS

GROUP	# OF STATIONS	TOTAL TVHHs DELIVERED	SHARE OF U.S. TOTAL
Capital Cities/ABC-TV	8	1,784,851	7.4%
CBS Television	5	1,133,333	4.7%
NBC Television	7	1,110,658	4.6%
Fox Television Stations	7	799,487	3.3%
Tribune Broadcasting Company	6	747,608	3.1%
Gillett Communications Company	10	659,938	2.7%
Westinghouse Broadcasting Co.	5	594,234	2.5%
Gannett Company Inc.	10	581,698	2.4%
Scripps Howard Broadcasting Co	9	559,407	2.3%
Cox Bcstg/Div. Cox Enterprises	7	556,733	2.3%
Hearst Corporation	6	454,780	1.9%
A. H. Belo Broadcasting Corp.	5	408,842	1.7%
Chris Craft/United TV Group	7	375,509	1.6%
Post-Newsweek Stations, Inc.	4	374,349	1.5%
LIN Television Corporation	7	300,325	1.2%
H & C Communications	6	297,551	1.2%
TVX Broadcast Group, Inc.	7	290,412	1.2%
Great American Communications	5	289,112	1.2%
Times Mirror Broadcasting	4	255,910	1.1%
Pulitzer Broadcasting Co.	8	246,021	1.0%
Univision Holdings	8	223,506	0.9%
Meredith Corp. Bcstg. Group	7	222,356	0.9%
Multimedia Broadcasting Co.	4	220,770	0.9%
Allbritton Communications	5	209,680	0.9%
Viacom Broadcasting Inc.	5	205,838	0.9%
Cosmos Broadcasting Corp.	7	182,490	0.8%
American Family Broadcast Grp.	7	173,774	0.7%
McGraw-Hill Broadcasting Co.	4	172,327	0.7%
Chronicle Broadcasting Co. Inc	5	166,520	0.7%
Gaylord Broadcasting Company	4	165,681	0.7%
Hubbard Broadcasting, Inc.	9	155,644	0.6%
King Broadcasting Company	4	152,758	0.6%
Adams Communications Corp.	10	151,314	0.6%
Lee Enterprises Inc.	4	149,767	0.6%
New York Times Co. Bcstg Group	5	149,645	0.6%
Fisher Broadcasting Inc.	2	140,090	0.6%
Park Broadcasting Inc.	7	139,971	0.6%
Young Broadcasting Inc.	7	135,581	0.6%
Television Stn. Partners, LP	8	135,518	0.6%
Midwest Communications Inc.	5	135,433	0.6%
Chase Communications, Inc.	5	135,156	0.6%
Anchor Media	3	135,062	0.6%
Telemundo Group, Inc.	6	134,738	0.6%
Media General Bcst. Group	3	126,157	0.5%
Combined Broadcasting Inc.	3	120,643	0.5%
Cook Inlet Radio Partners, LP	2	113,942	0.5%
Freedom Newspapers, Inc.	5	113,418	0.5%
Bonneville International Corp.	2	108,286	0.4%

DELIVERY OF U.S. TELEVISION HOUSEHOLDS BY GROUP - MAY 1990 ARBITRON SWEEPS

GROUP	# OF STATIONS	TOTAL TVHHs DELIVERED	SHARE OF U.S. TOTAL
St. Joseph News Press Gazette	8	107,953	0.4%
Renaissance Communications	4	107,578	0.4%
Taft Broadcasting Company	2	101,658	0.4%
Burnham Broadcasting Company	4	100,004	0.4%
SJL Broadcast Management Corp.	9	97,905	0.4%
Nationwide Communications Inc.	4	97,558	0.4%
Schurz Communications Inc.	4	96,587	0.4%
Kelly Television Co.	2	96,574	0.4%
Heritage Media Corporation	7	94,459	0.4%
Act III Broadcasting Inc.	8	92,733	0.4%
Dispatch Printing Co/Wolfe Grp	2	90,985	0.4%
Capitol Broadcasting Co., Inc.	4	90,578	0.4%
Jefferson-Pilot Communications	2	89,980	0.4%
Malrite Communications Grp.Inc	3	89,854	0.4%
Outlet Communications Inc.	2	89,063	0.4%
Midwest Television Inc.	4	87,642	0.4%
Busse Broadcasting Corp.	5	86,355	0.4%
Providence Journal Company	4	86,265	0.4%
Narragansett Broadcasting	2	85,623	0.4%
Cannell Communications	2	85,088	0.4%
Smith Broadcasting Group	9	84,783	0.4%
Spartan Radiocasting Company	4	82,680	0.3%
Guy Gannett Broadcasting Svcs.	4	76,067	0.3%
Gateway Communications, Inc.	4	75,545	0.3%
WTMJ Incorporated	3	75,317	0.3%
Diversified Communications	5	74,449	0.3%
Benedek Group	8	74,409	0.3%
Tak Communications Inc.	5	74,297	0.3%
Palmer Communications Inc.	2	67,251	0.3%
Bahakel Communications, Ltd	8	66,506	0.3%
Northstar Television Group Inc	4	65,245	0.3%
Quincy Newspapers Inc.	5	63,602	0.3%
Griffin Television Inc.	3	59,726	0.2%
Woods Communications Group Inc	5	58,748	0.2%
Koplar Communications Inc.	2	58,634	0.2%
Morgan Murphy Stations	5	58,559	0.2%
Imes Stations	4	54,752	0.2%
Ackerley Communications Inc.	5	54,677	0.2%
Granite Broadcasting Corp.	4	50,417	0.2%
Clear Channel Communications	5	48,586	0.2%
Morris Network Inc.	4	47,987	0.2%
Shamrock Broadcasting, Inc.	3	44,429	0.2%
John H. Phipps, Inc.	2	42,079	0.2%
Ralph C. Wilson Industries Inc.	3	41,892	0.2%
Retlaw Broadcasting Company	6	41,614	0.2%
Gray Communications Systems	3	41,021	0.2%
Sinclair Broadcast Group Inc.	3	40,319	0.2%
Harriscope Broadcasting	2	39,515	0.2%

DELIVERY OF U.S. TELEVISION HOUSEHOLDS BY GROUP - MAY 1990 ARBITRON SWEEPS

GROUP	# OF STATIONS	TOTAL TVHHs DELIVERED	SHARE OF U.S. TOTAL
Manship Stations	2	39,450	0.2%
Federal Broadcasting Company	5	39,323	0.2%
Maine Broadcasting System	3	39,165	0.2%
Lamco Communications, Inc.	3	39,080	0.2%
Broadcast Equities, Inc.	2	38,540	0.2%
Citadel Communications Co. Ltd	5	38,330	0.2%
Broadcast Management Services	2	38,321	0.2%
HR Broadcasting	2	37,968	0.2%
River City Broadcasting	2	37,600	0.2%
Price Communications Corp.	3	36,046	0.1%
Sunbelt Broadcasting Company	4	34,748	0.1%
Lewis Broadcasting Corporation	3	34,450	0.1%
Cordillera Communications	5	34,202	0.1%
Draper Communications Inc.	2	34,163	0.1%
Sarkes Tarzian Inc.	2	34,059	0.1%
Avant Development Corp.	4	33,083	0.1%
Stauffer Communications Inc.	9	32,643	0.1%
Pappas Telecasting Companies	2	31,127	0.1%
Marsh Media	5	31,092	0.1%
Bluegrass Broadcasting Co.	2	30,526	0.1%
Blade Communications Inc.	4	30,321	0.1%
ABRY Communications	3	29,418	0.1%
New Mexico Broadcasting Co.	2	29,226	0.1%
Davis-Goldfarb Company	3	28,094	0.1%
Southwest Multimedia Corp.	4	27,690	0.1%
McKinnon Broadcasting Company	2	27,504	0.1%
Wabash Valley Bcstg. Corp.	3	27,133	0.1%
Heritage Broadcasting Group	3	26,702	0.1%
Midcontinent Broadcasting Co.	4	26,524	0.1%
Harron Communications Corp	2	26,128	0.1%
WTWV, Incorporated	2	25,603	0.1%
Northwest Television, Inc.	4	24,390	0.1%
Mel Wheeler, Inc.	3	23,850	0.1%
Waterman Broadcasting Corp.	2	22,895	0.1%
Bloomington Comco, Inc.	3	22,063	0.1%
KWTX Broadcasting Company	2	21,210	0.1%
Drewry Group	2	20,727	0.1%
Dix Communications	5	20,633	0.1%
WTVZ Fox 33 TV, Inc.	2	20,202	0.1%
The Homes News Company	2	18,833	0.1%
Lanford Stations	2	18,335	0.1%
Pikes Peak Broadcasting Co.	2	17,992	0.1%
Withers Broadcasting Company	6	17,770	0.1%
California Oregon Broadcasting	4	17,728	0.1%
Dudley Broadcasting	2	17,387	0.1%
Meyer Broadcasting Stations	4	16,586	0.1%
FCVS Communications	2	16,580	0.1%
Forum Publishing Co.	4	15,956	0.1%

DELIVERY OF U.S. TELEVISION HOUSEHOLDS BY GROUP - MAY 1990 ARBITRON SWEEPS

GROUP	# OF STATIONS	TOTAL TVHHs DELIVERED	SHARE OF U.S. TOTAL
KSIX Television, Inc.	2	14,937	0.1%
Love Broadcasting Company	3	14,358	0.1%
Eagle Communications, Inc.	4	12,911	0.1%
United Communications Corp.	2	12,560	0.1%
MT Communications Inc.	4	12,496	0.1%
KXMC TV, Inc.	4	11,655	0.0%
Everett Group	4	10,797	0.0%
Frey Communications	2	10,665	0.0%
Seaway Communications Inc.	2	10,495	0.0%
Great Trails Broadcasting	2	9,262	0.0%
Beacon Communications	2	9,194	0.0%
Brechner Management Company	2	9,150	0.0%
Family Group Broadcasting	4	9,106	0.0%
Duhamel Broadcasting Entprses.	4	8,167	0.0%
Stainless Broadcasting Company	2	6,725	0.0%
Kimble Communications	2	6,653	0.0%
Media Central Inc.	2	6,326	0.0%
Ambassador Media Corporation	2	6,074	0.0%
Tri-State Christian Television	3	6,055	0.0%
Farragut Communications	2	5,773	0.0%
Big Horn Communications, Inc.	3	4,544	0.0%
American Communications & TV	2	4,136	0.0%
Green Group	2	3,028	0.0%
LeSea Inc.	4	2,650	0.0%
All American TV Inc.	3	0	0.0%
Carolina Christian Bcstg.	4	0	0.0%
Blackstar Communications, Inc.	3	0	0.0%
Christian Television Network	5	0	0.0%
Sainte Limited	2	0	0.0%
Video Mall Communications Inc.	2	0	0.0%
Christian Faith Broadcast Inc.	2	0	0.0%
WI Voice of Christian Youth	2	0	0.0%
Sudbrink Broadcasting Company	2	0	0.0%
New Life Evangelistic Center	2	0	0.0%
Trinity Broadcasting Network	13	0	0.0%
Corridor Broadcasting Co.	2	0	0.0%